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Department of
Agriculture

Forest
Service

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scm
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File Code: 2160

Date: January 13, 2017

US EPA

JAN 20 2017

IDAHO OPERATIONS OFFICE

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Vice President,
Environmental & Regulatory Affairs
J.R. Simplot Company
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999 W. Main St. Ste 1300
Boise, ID 83707

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RE: Additional Agencies' Comments – Smoky Canyon Mine RI/FS Draft Phase 2 Pilot Study Work Plan and Sampling and Analysis Plan Ultra-Filtration/Reverse Osmosis and Biological Selenium Removal Fluidized Bed Bioreactor Treatment Technology

Dear Alan,

Additional comments to the Smoky Canyon Mine RI/FS Draft Phase 2 Pilot Study Work Plan and Sampling and Analysis Plan Ultra-Filtration / Reverse Osmosis and Biological Selenium Removal Fluidized Bed Bioreactor Treatment Technology have been received and need to be incorporated into your response to comments. The revised due date is February 1, 2017. Please let me know if you need additional time to respond to these comments.

If you have any questions, please contact me at 208-236-7572.

Sincerely,

ARTHUR BURBANK
Remedial Project Manager

cc: Jeffery Hamilton; Simplot, Pocatello
Ron Quinn; Simplot, Smoky Canyon Mine
Burl Ackerman; Simplot, Boise
Fred Charles; Formation Environmental, Boulder
Sandi Fisher; USFWS, Pocatello
Colleen O'Hara; BLM, Pocatello
Brady Johnson; IDEQ, State Office
Wayne Crowther; IDEQ, Pocatello
Matt Wilkening, EPA
Kelly Wright; Shoshone-Bannock Tribes, Fort Hall
Susan Hanson; Shoshone-Bannock Tribes, Fort Hall
Rick McCormick; CH2M Hill, Boise



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Agencies' Comments - Smoky Canyon Mine RI/FS Draft Phase 2 Pilot Study Work Plan and Sampling and Analysis Plan Ultra-Filtration/Reverse Osmosis and Biological Selenium Removal Fluidized Bed Bioreactor Treatment Technology

Specific Comments

SC-1 Section 3.0, Page 15: In the second paragraph refer to "selenium is the only primary COPC..."

SC-2 Section 3.2.2: The text does not cover the criteria when the different analytical suites will be used in the monitoring but only as a note in table 3.8. Please include a short discussion on when each analytical suite will be used. Analytes in the Phase 1 full analytical suites should not be dropped from the sampling plan to Phase 2 full analytical suite unless week 0's or sequent week's results indicate below detection limits or the values are less than 50% of the chronic exposure and are stable or decreasing.

SC-3 Section 6.2.2, Page 47: As part of the SAP, please provide proof that the labs referenced are certified labs for environmental work.

SC-4 Appendix D (Summary of Results), Page 1, 2nd paragraph: This paragraph discusses weeks 0-12 with a reference to March 2016 to June 2016, but contains data for March 2015 to June 2016. It is understood that there were several starts and stops due to biofouling and other operational issues. A paragraph describing the operational issues should be included in this section and as to why the data from March 2015 to March 2016 are being dropped from being used in the appendix.